

# **COUNTY OF LOS ANGELES**

# Internal Services Department

1100 North Eastern Avenue Los Angeles, California 90063



To enrich lives through effective and caring service.

August 1, 2007

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To:

**Each Supervisor** 

From:

Dave Lambertson

Director

Subject:

COUNTYWIDE ENERGY AND ENVIRONMENTAL POLICY TEAM

UPDATE REPORT

This memo provides an update on the accomplishments and activities of the Energy and Environmental Policy Team (Team) created through your Board's approval of the Countywide Energy and Environmental Policy (Policy) on January 16, 2007. The Policy states that the Team shall report back to your Board every 6 months.

#### **TEAM ORGANIZATION**

The Team is led by ISD and includes representatives from County Counsel, Chief Executive Office, Department of Public Works, Department of Parks and Recreations, Sheriff's Department, Public Library Department, Department of Health Services, Department of Public Health, Department of Community and Senior Services, Community Development Commission, Southern California Edison, Southern California Gas Company, and the Los Angeles Department of Water & Power.

The Team meets bi-monthly. Working committees have been established within each program area listed below and meet as necessary to accomplish the goals of the Policy.

- Energy and Water Efficiency Program
- Green Building Operations Program
- Environmental Stewardship Program
- Public Education & Outreach Program

#### SIGNIFICANT ACCOMPLISHMENTS AND ACTIVITIES

Significant Team accomplishments and activities are described below. A more detailed description of the programs and additional activities are included in Attachment 1. In addition, the Team has been providing support on Board directed reports on energy and environmental issues which are also listed in Attachment 1.

 ISD has developed an Environmentally Preferable Purchasing Policy which establishes objectives for County purchasing that support the Energy and Environmental Policy. The California State Association of Counties, in coordination with ISD's Purchasing Division, is hosting a regional green purchasing seminar to be held on August 23, 2007.

- Public Works has expanded its existing County Departmental Recycling Program by purchasing 40,000 desk-side paper recycling bins and an initial set of beverage container recycling bins.
- A series of energy and environmental "fairs" are being scheduled to provide County employees with information on energy efficiency and sustainable products and practices for home and work. The "fairs" will be held periodically at campus-type settings throughout the County. The first fair is scheduled for September 27, 2007 in the mall between the Hall of Administration and the Mosk Courthouse. The Office of Small Business has integrated an energy and environmental program into their series of "Doing Business with the County" workshops.
- The County's proposed 2007-08 Capital Program reflects 53 projects that have been designated for the sustainable design program. Further, 20 of the projects will be certified at the LEED Silver level or higher.
- LEED Existing Building certification studies are being conducted at two County facilities (ISD Headquarters and the Public Works Headquarters Tower). These studies will assist in formulating a building best practices guide for operating and maintaining County facilities.
- The County has joined the California Climate Action Registry in order to utilize their reporting protocol for developing an assessment of the County's total greenhouse gases emissions responsibility. The Team is gathering information for reporting on the County's 2006 greenhouse gases emissions and developing an internal protocol for interdepartmental documentation of information needed for future reporting.
- ISD implemented energy efficiency projects have resulted in electricity savings of up to \$13 million per year. The cumulative savings since 1994, when ISD initiated the program, is more than \$90 million, while the costs of the projects have been approximately \$30 million.

If you have any questions, please contact me or Howard Choy at (323) 881-3939.

DL:HWC:g

Attachment

c: William T. Fujioka, CEO ISD Board Deputies Each Department Head

# Key Activities and Accomplishments of Energy & Environmental Policy Team

This document provides information on the activities and accomplishments to date of the Energy and Environmental Policy Team (Team). The Team was created by the Board on January 16, 2007 when it adopted the Countywide Energy and Environmental Policy (Policy). The information in this report is presented under four main headings consistent with the Policy program areas:

- Energy & Water Efficiency
- Green Building Operations
- Environmental Stewardship
- Public Education & Outreach

# **ENERGY & WATER EFFICIENCY PROGRAM**

# **Program Description**

This program seeks to further reduce County facilities energy and water consumption through the establishment of specific reduction targets and formal reporting to measure progress towards these targets and to reduce energy consumption in County facilities by 20% by 2015. The program includes an initiative to enhance employee and organization education and awareness, implement conservation monitoring practices, and implement energy and water efficiency projects in County buildings.

# **Employee and Organizational Education**

The Team is coordinating a series of energy and environmental "fairs" which will provide employees with exposure to energy efficient and sustainable products and practices for home and work. The "fairs" will feature energy and environmental industry experts, manufacturers, and product representatives who will provide information, handouts, and product samples related to:

- Utilities energy efficiency and renewable programs
- Energy efficient products, appliances and heating/cooling systems for the home
- Solar and distributed generation systems
- Environmentally friendly products for home and office use
- Public transit and hybrid vehicles
- Green building and home certifiers
- Other sustainable products and services

The "fairs" will be held periodically at campus type settings throughout the County. The first "fair" is scheduled for September 27, 2007 in the mall between the Hall of Administration and the Mosk Courthouse.

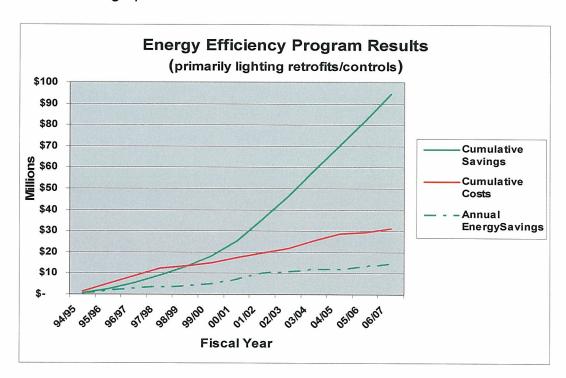
# Key Activities and Accomplishments of Energy & Environmental Policy Team

A County-wide email to all departments has been sent out urging conservation measures that can be implemented by all employees to help reduce regional energy demand this summer.

ISD has been conducting training classes for building management personnel throughout the County on the use of the Enterprise Energy Management Information System (EEMIS). EEMIS, among other things, allows building managers and other staff to track energy consumption and compare it against past periods' energy usage both in "real-time" and over longer periods of time. EEMIS is a critical tool that ISD will be using to monitor progress towards meeting the 20% energy reduction goal.

## **Conservation Monitoring Practices**

ISD has implemented hundreds of energy efficiency projects since 1994-95. These projects include retrofitting lighting systems and other equipment, installing lighting system controls, and facility retrocommissioning. Retrocommissioning involves performing detailed "tune up" of a building's energy-using systems to insure they are operating in an optimal manner. These projects have resulted in electricity savings of up to \$13 million per year. The cumulative savings since 1994 is more than \$90 million, while the costs of the projects have been approximately \$30 million. The annual and cumulative savings and costs of all energy efficiency projects implemented by ISD are shown in the graph below.



The energy consumption baseline from which progress towards achieving the 20% reduction goal by 2015 will be measured using electricity and natural gas consumption

# Key Activities and Accomplishments of Energy & Environmental Policy Team

from calendar years 2002 through 2004. Averaging over multiple years mitigates consumption variances due to unusually hot or mild seasons. This baseline is currently being developed within EEMIS to include natural gas and electricity for the entire County and for a subset of the County's largest energy consuming facilities where most of the energy efficiency projects have been implemented and the results have been closely monitored.

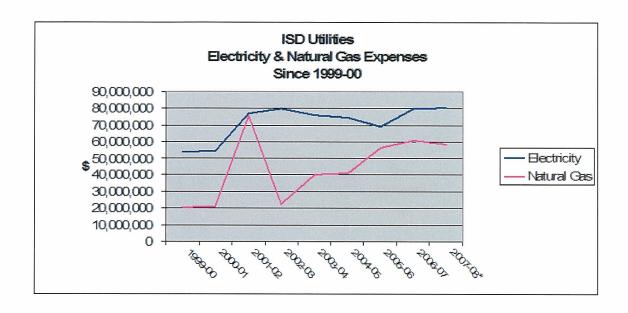
EEMIS allows County facility managers or energy management staff to observe "real-time" energy consumption via the internet. The immediate impacts of energy projects, operational changes, and behavioral changes like voluntary demand reduction can be observed through this functionality. Currently about 150 of the County's largest facilities are monitored by EEMIS. These facilities use more than 80% of the energy consumed by County buildings.

EEMIS monitoring is not implemented at all County facilities. To do so is cost prohibitive. For all facilities but in particular those that are not monitored directly by EEMIS, EEMIS is used to analyze consumption trends using utility bill information. The impacts of energy efficiency, retrocommissioning, and other projects over months and years can be monitored using this functionality. Currently Southern California Edison and the Gas Company provide billing information via electronic file transfers. ISD is working with the Los Angeles Department of Water & Power to receive bill information for County accounts in their service territory.

As directed under the Policy, the County has joined the California Climate Action Registry (Registry). Under the Registry's reporting protocols, the Team is developing an initial report that will represent the amount of greenhouse gases produced as a result of County operations. The Team will use documented energy savings converted to greenhouse gases avoidance as a key element of reporting the County's progress towards reducing its greenhouse gases emissions. More details on the Team's activities to develop a greenhouse gases report under the Registry are described later in this report under the Environmental Stewardship Program's description of activities.

# **Energy and Water Efficiency Projects**

A representation of the annual ISD-managed Utilities Budget for FY 1999-00 to FY 2007-08 is depicted below. Despite rising costs, the electricity budget has remained relatively stable due to the savings generated by ongoing energy efficiency projects. The natural gas budget reflects the volatility in market prices for fuel purchases for the County's cogeneration power plants and other large facilities such as jails, hospitals, and probation camps. About one-third of the natural gas budget is used for the cogeneration power plants which don't represent significant opportunities for energy efficiency projects. The electricity budget and remaining natural gas budget still contain opportunities for efficiency savings especially considering the potential under retrocommissioning.



ISD started its facility retrocommissioning program in early 2005 and by the end of that year had retrocommissioned 13 County facilities. The results, based on actual reductions observed in utility bills, are indicated below. Facility retrocommissioning represents ISD's first focused effort at reducing natural gas consumption in County facilities. As can be seen below, the natural gas savings potential in County facilities is significant.

13 Facilities Retrocommissioning Cost: \$1.3 million Total Annual Retrocommissioning Savings: \$0.4 million

Average Facility Electricity Savings: 20% Average Facility Natural Gas Savings: 40%

The Team is working with the departments responsible for most of the County's building maintenance (ISD, Sheriff, Health Services and Public Works) to identify and prioritize deferred maintenance projects with the greatest potential energy savings. Deferred Maintenance refers to the backlog of maintenance and repair projects that have been deferred to future budgets. Deferring maintenance often results in increased maintenance and energy costs. Using a combination of County funding, state grants, utility incentives and financing, the Team will develop a program designed to provide incentives to implement deferred maintenance projects which save energy costs. This effort supports the Board motion dated June 18, 2007 directing ISD to make energy efficiency a criterion for prioritizing deferred maintenance projects.

Funding for retrocommissioning and other energy efficiency projects is critical to developing energy savings. ISD has received \$13 million since 2002 in grants from the California Public Utilities commission (CPUC) from their energy efficiency programs including \$6 million for calendar years 2006-08. ISD and its utility company partners will

# Key Activities and Accomplishments of Energy & Environmental Policy Team

be submitting a proposal for the CPUC's 2009-11 energy efficiency program. Also, ISD's budget for FY 2006-07 and FY 2007-08 includes \$5 million each fiscal year for energy efficiency projects.

## Water Efficiency

The Team met with Public Work's Office of Reclaimed Water to begin prioritizing County sites for reclaimed water use. The Team will continue to participate in that Office's regular, program development meetings. Other water efficiency technologies for existing County facilities are being examined and evaluated under two Leadership in Energy and Environmental Design (LEED) Existing Building feasibility studies that are described later in the report under the Green Building Operations Program.

ISD is installing waterless urinals in its Administrative Headquarters this fiscal year and will document water savings versus maintenance costs and develop recommendations related to expansion of this technology.

## **GREEN BUILDING OPERATIONS PROGRAM**

## **Program Description**

The Policy directed the CEO and Public Works to develop a sustainable design program for the County's Capital Construction Program and promote sustainable County operations practices. On January 16, 2007 the Board directed that the Capital Construction Program achieve LEED Silver Certification for new buildings greater than 10,000 square feet. The Policy instructed the Team to provide support to this effort in the form of technical expertise in building operations and maintenance, environmental programs, and in energy and water efficiency.

#### New Construction – LEED Silver Certification Technical Support

The County's proposed 2007-08 Capital Program reflects 53 projects that have been designated for the sustainable design program. Further, 20 of the projects will be certified at the LEED Silver level or higher. LEED certification for new buildings requires that building systems be rigorously commissioned to ensure they are operating properly and efficiently when construction and testing are completed. Commissioning a building's heating, ventilating and air conditioning (HVAC) systems establishes the benchmark against which the system's energy performance will be measured in future years to determine if the building is in need of retrocommissioning and ensure long term energy savings.

ISD is working with the CEO and Public Works to utilize ISD's retrocommissioning experience in the commissioning of new buildings. ISD's retrocommissioning projects have been partially funded by the CPUC and, as a result, those retrocommissioning

# Key Activities and Accomplishments of Energy & Environmental Policy Team

standards and procedures have been reviewed and approved by our utility companies and by  $3^{\rm rd}$  party auditors.

In addition, ISD is working with the CEO and Public Works to implement EEMIS monitoring in new building construction. Using EEMIS to store building system's commissioning information ensures that energy performance can be benchmarked and continuously evaluated.

Utility companies now offer incentives for energy efficiency designs in new buildings and major renovation projects. These funds are available during the design and procurement phases of projects and can offset the higher cost of more efficient equipment. The Team will work with the CEO and Public Works to facilitate the application and receipt of these incentives.

# Existing Facilities - LEED Existing Building (EB) Studies

The Team is exploring a comprehensive and consistent methodology for implementing energy efficient and sustainable practices into existing County building operations through LEED EB certification. LEED EB differs from LEED NC (new construction) in that certification points are achieved primarily from existing building/site operating and maintenance practices. LEED EB categories include: site sustainability, water and energy efficiency, indoor air quality, source waste reduction and waste diversion, and sustainable operations and maintenance. These categories encompass green purchasing, recycling, landscape and building operations and maintenance practices, and comprehensive energy management.

Two studies are underway to determine the feasibility of achieving LEED EB certification. The two sites being examined are the Public Works Headquarters Tower building and the ISD Administrative Headquarters. Their age and size is representative of most medium and large County office buildings. The studies will be completed over the next 6 months.

### **County Facility Operating and Maintenance Best Practices**

Using information from the LEED EB studies above and case studies of other facilities with LEED EB or equivalent certifications, ISD will develop a manual of recommended best practices for facilities for which ISD is responsible for operations and maintenance. The manual will serve as a guide to determine general scope of work necessary to attain LEED EB certification for County facilities.

# **Environmentally Preferable Purchasing**

The Countywide Energy and Environmental Policy states that the Policy Team will investigate requirements and preferences for environmentally friendly packaging, place

# Key Activities and Accomplishments of Energy & Environmental Policy Team

greater emphasis on recycled products, and maximize energy efficiency as part of the development of an environmentally responsible purchasing standard. On June 14, 2007 ISD's Purchasing Division released County Purchasing Policy P-1050, "Purchase of Environmentally Preferable Products" which establishes objectives for County purchases that:

- Conserve natural resources;
- Minimize environmental impacts such as pollution and use of water and energy;
- Eliminate or reduce toxics that create hazards to workers and our community;
- Support strong recycling markets;
- Reduce materials that are put into landfills;
- Increase the use and availability of environmentally preferable products that protect the environment;
- Encourage manufacturers and vendors to reduce environmental impacts in their production and distribution systems; and
- Create a model for successfully purchasing environmentally preferable products that encourages other purchasers to adopt similar goals.

Under the purchasing policy, ISD's Purchasing Division will determine appropriate standards for green purchasing and will develop a 5-year plan to phase-in categories of certified goods. Easy to adopt purchasing categories (e.g., paper, cleaning supplies) will be implemented as soon as possible. Central purchasing agreements with a catalog of environmentally friendly and energy efficient products will be established and existing agreement databases will be modified for easy identification of green products. ISD's Purchasing Division is retaining a consulting firm to help develop environmentally preferable purchasing specifications.

The California State Association of Counties, in coordination with ISD's Purchasing Division, is hosting a regional green purchasing seminar to be held on August 23, 2007 at Public Works' Event & Training Room B beginning at 1:00 p.m. The event will feature nationally recognized experts sharing knowledge on local government green purchasing best practices and tools necessary to implement and achieve green purchasing goals.

# Other Green Building Activities

As part of the motion approving the Policy, the Board requested a report from Regional Planning and Public Works on the opportunities to incorporate LEED standards or similar requirements into the County's development standards for all appropriate industrial, commercial and residential development within the unincorporated areas. The Team is providing technical assistance in developing the report.

Regional Planning and Public Works will be reporting back to the Board on August 31, 2007.

# Key Activities and Accomplishments of Energy & Environmental Policy Team

# **ENVIRONMENTAL STEWARDSHIP PROGRAM**

# **Program Description**

The purpose of this program is to measure and reduce the County's "environmental footprint" including the amount of greenhouse gases produced through direct and indirect County operations. Also under this program, the Team works to enhance County environmental policies and programs that are already implemented.

# **Environmental Footprint – Greenhouse Gases Reporting**

As mentioned earlier, the County has joined the California Climate Action Registry (Registry) to utilize their reporting protocol and adapt it for use as a County protocol for determining the County's total greenhouse gases emissions responsibility. This reporting encompasses specific measurements of the following operations in order to comprehensively quantify greenhouse gases emissions responsibility:

- Electricity and natural gas purchased from utilities
- Electricity produced by County operations
- Liquid fuels and natural gas consumed by stationary sources (e.g., boilers, standby generators)
- Liquid fuels and natural gas consumed by mobile sources (e.g., cars, trucks and miscellaneous construction and maintenance equipment)
- Refrigerants consumed in County facilities and vehicles (primarily air conditioning equipment)

ISD is acquiring County-wide utility consumption information and electricity production information and is working with large departments to determine quantities of fuels and refrigerants consumed. The Team is also working to determine the responsibility the County has for reporting greenhouse gases emissions involving operating leases, capital leases, and other financial or operational agreements that are directly and indirectly responsible for producing greenhouse gases emissions.

Development of a County protocol for determining the County's total greenhouse gases emissions responsibility that utilizes centrally maintained information and a standard reporting process for all departments is consistent with the Board's Policy and:

- Could be required to report greenhouse gases emissions responsibility (and reductions through its energy and environmental programs) under regulations currently being developed at State agencies.
- Allow the County to participate in future greenhouse gases trading markets either to comply with regulations or to get credit for its program reductions.

# Key Activities and Accomplishments of Energy & Environmental Policy Team

An initial report under Registry protocol and an independent audit of that report, for 2006 greenhouse gases emissions, will be completed by the end of this calendar year.

# Climate Change Regulatory and Legislative Activity

AB 32 was signed into law in 2006 and requires the State to lower greenhouse gases emissions by 2020 to 1990 levels. Regulations that determine which entities (e.g. counties) that will be required to report greenhouse gases responsibility, how 1990 baseline levels will be determined, how greenhouse gases reductions will be measured and credited, the role of local governments in enforcement, and a host of other issues are being determined at various State agencies. This was described in a memorandum sent to your Board dated February 26, 2007.

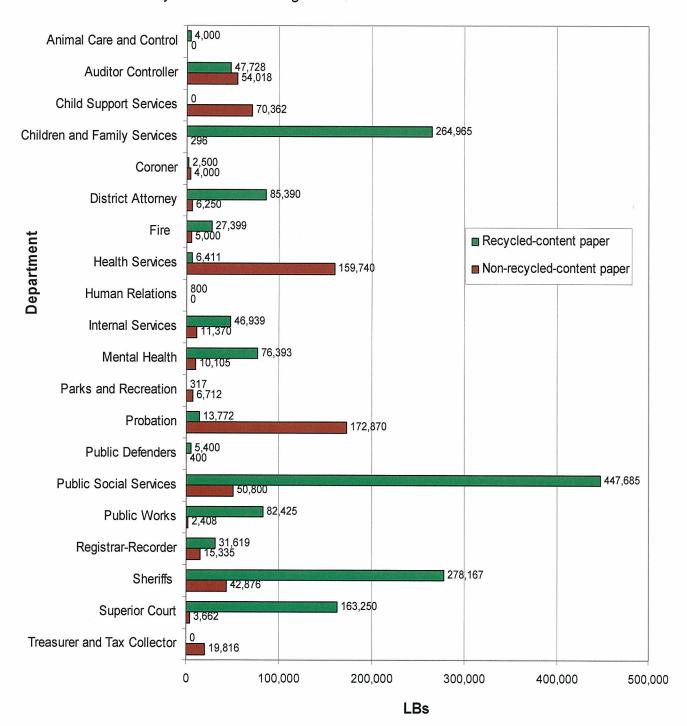
Additionally, dozens of proposed bills to modify or enhance AB 32 are under consideration at the State legislature. ISD is tracking this regulatory and legislative activity. An AB 32 update briefing for interested County parties is being scheduled for August 2007. A separate, update report on the status of AB 32 implementation activities will be sent to your Board after the briefing.

# **Departmental Recycling**

The Team is working to enhance the County Departmental Recycling Program which is led by Public Works' Environmental Programs Division. The Policy placed a priority on implementing recycling bins in visible areas for the segregation of paper, plastic, glass and other recyclables from normal waste.

To enhance paper recycling through the purchase of recycled-content paper, Public Works currently monitors the amount of recycled-content (RC) versus non-recycled (non-RC) paper purchased through the Countywide vendor by various departments. The chart below illustrates the amount of RC versus non-RC paper that was purchased by participating departments during the first quarter of 2007. Current County policy allows a 10 percent price preference when purchasing RC paper over non-RC paper. According to Public Works, the quality of RC paper is comparable to non-RC paper while the RC price difference compared to non-RC paper is about 5 percent higher based on current rates provided by the vendor. Public Works will work with ISD to make RC paper mandatory for all County departments. Mandatory RC paper procurement would not have a significant economic impact and will substantially enhance departmental recycling efforts.

# POUNDS OF RECYCLED-CONTENT VS. NON RECYCLED-CONTENT PAPER Purchased from County-side Vendor during First Quarter of 2007



Public Works has purchased 40,000 desk-side paper recycling bins for distribution to County employees in buildings that are enrolled in the existing paper recycling program. The desk-side bins emphasize individual recycling and segregation of white paper from other recyclable paper. These bins are currently being distributed at the Hall of Administration, ISD Headquarters and Public Works Headquarters. Also, Public Works is purchasing outdoor beverage container recycling bins. The bins will be installed at the Hall of Administration, Registrar-Recorder's Norwalk Office, Stanley Mosk Courthouse, Downey Courthouse and Norwalk Courthouse this summer.

## Other Board Motioned Environmental Activity

The Board has requested reports on various energy and environmental initiatives which are related to the work of the Policy Team. The Team is currently participating in committees and assisting departments in responding to these motions as indicated below:

TOPIC	ASSIGNED TO	MOTION DATE	DUE DATE/STATUS
Study on requiring LEED or equivalent standard on all development in unincorporated areas.	Regional Planning, DPW	1/16/07	Originally due 7/17; a 45 day extension was requested to 8/31.
Study on incorporating Low Impact Design standards (LIDS) for new development projects.	Regional Planning, DPW	1/16/07	Originally due 7/17; a 45 day extension was requested to 8/31.
Study on proposed incentives for employee purchased hybrids and increased mass transit use	CEO, DPW,	3/13/07	Status memo sent to BOS on 6/7 requesting an extension.
Investigation into banning plastic bags similar to the ban in San Francisco	CEO led ad- hoc committee	4/10/07	Status memo sent to Board on 7/12 requesting 45-day extension. Board letter with findings and recommendations targeted for 8/21 agenda.
Study on the impacts of banning Styrofoam food containers throughout the County	DPW, ISD	5/22/07	Response due 8/20.
Incorporate energy efficiency as a criteria for prioritizing deferred maintenance	ISD	6/18/07	Energy efficiency criteria will be incorporated in the prioritized listing of deferred maintenance projects published 9/30.

# Key Activities and Accomplishments of Energy & Environmental Policy Team

### PUBLIC EDUCATION AND OUTREACH PROGRAM

## **Program Description**

The purpose of this program is to utilize the County's communication and outreach channels to share utility industry information, facilitate implementation of subsidy and assistance programs, and spread energy conservation practices throughout the region.

## **Regional Outreach**

The County employee energy and environmental fairs described earlier, though held at County venues and marketed towards County employees will be open to the public as well.

The Team presented an overview of the Energy and Environmental Policy and an update on AB 32 at a Doing Business with the County Workshop conducted by the Office of Small Business. This workshop was held on 3/1/07 in El Segundo. The Office of Small Business has indicated they will integrate an energy and environmental program into future workshops agendas. The Team is working with the Small Business Commission on promoting greater energy efficiency and environmental stewardship awareness for small businesses.

#### **Low Income Activities**

The Community Development Commission/Public Housing Authority (CDC/PHA) has met with utility companies to discuss increasing the enrollment of more public housing tenants onto low-income subsidy programs. This is a stated priority of the CPUC. One identified barrier is tenant education and facilitation of the application process. The utility companies and CDC/PHA are scheduling a series of presentations at low-income facilities to describe these programs and the application process and help enroll qualified tenants. CDC/PHA will also assist tenants in these areas as part of their operations.

CDC/PHA and the utilities are exploring another opportunity to enroll more low-income tenants on these programs. It was discovered that nearly all of the CDC/PHA tenants at the Nueva Maravilla facility qualify for the California Alternative Rates for Energy (CARE) program administered by the utilities; however, they cannot be enrolled onto this program because the facility is on a single, utility meter (master-metered). CARE provides a 20% monthly discount on bills but not for master-metered tenants. CDC/PHA, through Southern California Edison, provided testimony at a CPUC Low Income Oversight Board hearing in June of this year requesting modification of either the utilities program administration or the Commission's program regulations. CDC/PHA, the utilities and the Team are also investigating the resources that may be needed to resolve this issue through legislation. The Team will involve other utilities

and public housing authorities to investigate proposed legislation that would eliminate the master-metered disqualification for CARE programs and increase enrollment of otherwise qualified, public housing tenants onto low-income programs throughout the State.

As a result of participating on the Policy Team, the CDC/PHA is developing an energy strategy for their existing facilities and construction program.

#### **Local Government Collaboration**

The County, through ISD, has joined the Local Government Commission Sustainable Energy Coalition (LGSEC). The LGSEC is a membership of local governments who have committed to tracking and participating in energy activities jointly in order to conserve expenses and speak with a stronger, unified voice.

The LGSEC has been active in submitting comments to the CPUC describing the unique value of local governments in promoting and implementing energy efficiency. Many local governments (mostly in the South Bay area) have energy management programs that serve not only their own municipal infrastructure and operations but business and residential constituents as well. LGSEC comments at these proceedings have sought an expanded role for local governments and expanded programs which utilize local governments' unique collaborative and outreach resources.

ISD led a study in 2005, funded by a CPUC grant, which investigated how local governments and public agencies in the region could promote energy efficiency. That study concluded that lack of industry expertise, leadership and resources were preventing energy efficiency projects from being implemented. ISD has proposed to the CPUC that its current grant be expanded to investigate how the County can play a role in centrally promoting and administering efforts to implement energy efficiency projects at County-affiliated agencies (e.g., MTA, County Office of Education, Small Business Commission, Sanitation Districts, etc.) and other, smaller local governments. The County will also include a proposal under the CPUC's 2009-11 energy efficiency partnership programs to do the same.